

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

NATALIE HENSHILWOOD, SHAWN  
JONES, and PRIME TITLE AGENCY,  
INC.,

*Plaintiffs,*

V.

JPMORGAN CHASE BANK  
NATIONAL ASSOCIATION AND JP  
MORGAN CHASE & CO.,

*Defendants.*

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CIVIL ACTION NO: 4:25-cv-01926

**AGREED MOTION FOR EXTENSION OF TIME FOR DEFENDANTS  
TO ANSWER OR FILE A RESPONSIVE PLEADING**

Pursuant to Federal Rule of Civil Procedure 6(b) and Southern District of Texas Local Rule 7.8, Defendants, JPMorgan Chase Bank, N.A. and JP Morgan Chase & Co. (collectively, “Defendants”), respectfully move for a fourteen-day extension of time to answer or otherwise plead in response to the Complaint filed by Plaintiffs, Natalie Henshilwood, Shawn Jones, and Prime Title Agency, Inc. In support of this Motion, Defendants state as follows:

1. On March 31, 2025, Plaintiffs commenced this action by filing their Original Petition (the “Complaint”) in the 215<sup>th</sup> District Court of Harris County, Texas and requesting service on Defendants. Service was completed on both Defendants on April 4, 2025.

2. On April 28, 2025, Defendants timely removed this matter to this Court.

Since no responsive pleading was filed in the state court matter before removal, Defendants' deadline to answer or file any other responsive pleading is May 5, 2025.

3. Counsel for Defendants conferred with counsel for Plaintiffs on May 2, 2025 and requested an extension until May 19, 2025 to answer or otherwise respond to the Complaint, to allow time for the parties to comply with the Court's pre-motion procedures. Counsel for Plaintiffs agreed to this request to extend the date to file a responsive pleading.

4. This is Defendants' first request for an extension of time. This request is not being made for the purpose of delay and will not affect any other dates in this case, nor will any party be prejudiced.

**WHEREFORE**, Defendants, JPMorgan Chase Bank, N.A. and JP Morgan Chase & Co., respectfully request that the Court grant this Motion and enter an order allowing them until Monday, May 19, 2025, to answer or otherwise plead in response to Plaintiffs' Complaint.

Dated: May 5, 2025

Respectfully submitted,

/s/ Jennifer Tomsen  
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**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF CONFERENCE**

I hereby certify that counsel for Defendants conferred with counsel for Plaintiffs on May 2, 2025 and Plaintiffs have agreed to the relief sought in this Motion.

/s/ Jennifer Tomsen  
Jennifer Tomsen

**CERTIFICATE OF SERVICE**

I hereby certify that on this 5<sup>th</sup> day of May, 2025 a true and correct copy of the foregoing was served upon all counsel of record via the Court's ECF system.

/s/ Jennifer Tomsen  
Jennifer Tomsen